

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BUNGIE, INC.,

Plaintiff,

v.

AIMJUNKIES.COM; PHOENIX
DIGITAL GROUP LLC; DAVID
SCHAEFER; JORDAN GREEN;
JEFFREY CONWAY; and JAMES MAY,

Defendants.

No. 2:21-cv-811-TSZ

DECLARATION OF WILLIAM C. RAVA
IN SUPPORT OF PLAINTIFF
BUNGIE, INC.'S OPPOSITION TO
DEFENDANTS' MOTION TO STAY
EXECUTION OF ARBITRATION
JUDGMENT

**EXHIBITS 3-13 AND 15
FILED UNDER SEAL**

I, William C. Rava, declare as follows:

1. I am an attorney licensed to practice law before the courts of the State of Washington. I am a Partner at Perkins Coie LLP, and counsel in this action for Plaintiff Bungie, Inc. ("Bungie" or "Plaintiff"). I submit this declaration in support of Plaintiff Bungie, Inc.'s Opposition to Defendants' Motion to Stay Execution of Arbitration Judgment. I have personal knowledge of the facts stated herein and, if called upon, could and would testify competently thereto under oath.

2. On August 22, 2023, Bungie began various collection efforts against Defendants by domesticating the partial judgment in three states—Oregon, Arizona, and later Ohio. After filing the domestication papers in the first two states (Oregon and Arizona), I sent courtesy copies

RAVA DECL. ISO BUNGIE'S
OPP'N TO DEFS.' MOT. TO STAY
(No. 2:21-cv-811-TSZ) – 1

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 of those papers to Defendants' counsel in this case and asked whether Defendants' counsel would
2 accept service on behalf of Green, Conway, and Phoenix Digital Group LLC ("Phoenix Digital").
3 Defendants' counsel eventually confirmed that he did not represent any of the Defendants in
4 connection with the enforcement of the partial judgment.

5 3. In fall 2023, Bungie then conducted various collection activities, including
6 obtaining a lien on Conway's property in Arizona, and serving discovery requests on all
7 Defendants as authorized under state law to identify their assets, and again providing courtesy
8 copies of the papers to Defendants' counsel in this case. Defendants have failed to object or
9 respond to these discovery requests, or otherwise engage in those proceedings in any way.

10 4. Bungie attempted to serve all Defendants at the addresses at which they previously
11 served those Defendants in this case. Bungie has been unable to personally serve some of the
12 Defendants in the enforcement proceedings.

13 5. Attached hereto as **Exhibit 1** are true and correct copies of excerpts from the March
14 20, 2023 30(b)(6) deposition of Phoenix Digital.

15 6. Attached hereto as **Exhibit 2** are true and correct copies of excerpts from the March
16 23, 2023 deposition of James May.

17 7. Attached hereto as **Exhibit 3** are true and correct copies of excerpts from the
18 October 28, 2022 deposition of David Schaefer.

19 8. Attached hereto as **Exhibit 4** are true and correct copies of excerpts from the
20 October 12, 2022 deposition of Jordan Green.

21 9. Attached hereto as **Exhibit 5** is a true and correct copy of the PayPal Account Info
22 sheet for the Phoenix Digital PayPal account that was produced by PayPal in response to Bungie's
23 subpoena and bears the bates numbers PP_WDWA_0000056-65.

24 10. Attached hereto as **Exhibit 6** is a true and correct copy of the PayPal Account Info
25 sheet for Jeffrey Conway's PayPal account that was produced by PayPal in response to Bungie's
26 subpoena and bears the bates numbers PP_WDWA_0000026-29.

RAVA DECL. ISO BUNGIE'S
OPP'N TO DEFS.' MOT. TO STAY
(No. 2:21-cv-811-TSZ) – 2

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 11. Attached hereto as **Exhibit 7** is a true and correct copy of the PayPal Account Info
2 sheet for David Schaefer's PayPal account that was produced by PayPal in response to Bungie's
3 subpoena and bears the bates numbers PP_WDWA_0000014-21.

4 12. Attached hereto as **Exhibit 8** is a true and correct copy of the PayPal Account Info
5 sheet for Jordan Green's PayPal account that was produced by PayPal in response to Bungie's
6 subpoena and bears the bates numbers PP_WDWA_0000049-55.

7 13. Attached hereto as **Exhibit 9** is a true and correct copy of the PayPal Account Info
8 sheet for James May's PayPal account that was produced by PayPal in response to Bungie's
9 subpoena and bears the bates numbers PP_WDWA_0000039-48.

10 14. Attached hereto as **Exhibit 10** is a true and correct copy of the PayPal Account Info
11 sheet for Phoenix Digital's PayPal account associated with the website mombot.co.uk that was
12 produced by PayPal in response to Bungie's subpoena and bears the bates numbers
13 PP_WDWA_0000022-25.

14 15. Attached hereto as **Exhibit 11** is a true and correct copy of the PayPal Account Info
15 sheet for Phoenix Digital's PayPal account associated with the website velocitycheats.com that
16 was produced by PayPal in response to Bungie's subpoena and bears the bates numbers
17 PP_WDWA_0000030-31.

18 16. Attached hereto as **Exhibit 12** is a true and correct copy of the PayPal Account Info
19 sheet for Phoenix Digital's PayPal account associated with the website virtual-advantage.net that
20 was produced by PayPal in response to Bungie's subpoena and bears the bates numbers
21 PP_WDWA_0000071-76.

22 17. Attached hereto as **Exhibit 13** is a true and correct copy of the PayPal Account Info
23 sheet for Phoenix Digital's PayPal account associated with the website aimjunkies-brasil.com that
24 was produced by PayPal in response to Bungie's subpoena and bears the bates numbers
25 PP_WDWA_0000130-132.
26

20. Attached hereto as **Exhibit 16** are true and correct copies of excerpts from the March 28, 2023 deposition of Jordan Green.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Seattle, Washington on this 26th day of December, 2023.

/s/William C. Rava
William C. Rava